

**UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND
(Northern Division)**

IN RE TITANIUM DIOXIDE ANTITRUST
LITIGATION

Master Docket No. 10-CV-00318-RDB

**THIS DOCUMENT RELATES TO: All
Actions**

**CERTAIN DEFENDANTS' JOINT
NOTICE OF MOTION AND MOTION TO
DISMISS PLAINTIFFS' AMENDED
CONSOLIDATED COMPLAINT**

**CERTAIN DEFENDANTS' JOINT NOTICE OF MOTION AND MOTION TO DISMISS
PLAINTIFFS' AMENDED CONSOLIDATED COMPLAINT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendants E.I. du Pont de Nemours & Co., Huntsman International LLC, Kronos Worldwide Inc., and Millennium Inorganic Chemicals Inc. hereby move to dismiss Plaintiffs' Amended Consolidated Complaint ("Complaint").

This Motion is based upon Federal Rule of Civil Procedure 12(b)(6), on the ground that the allegations set forth in the Complaint, even if taken as true, do not state a claim upon which relief can be granted, as explained fully in the accompanying Memorandum of Points and Authorities.

Dated: May 28, 2010

Respectfully Submitted,

CROWELL & MORING LLP

By: _____/s/
Shari Ross Lahlou (MDBN 16570)

Kent A. Gardiner

kgardiner@crowell.com

Jeffrey Blumenfeld

jblumenfeld@crowell.com

Shari Ross Lahlou

slahlou@crowell.com

Ryan C. Tisch

rtisch@crowell.com

CROWELL & MORING LLP

1001 Pennsylvania Avenue, N.W.

Washington, D.C. 20004-2595

Telephone: (202) 624-2500

Facsimile: (202) 628-5116

Attorneys for Defendant E.I. du Pont de Nemours & Co.

HOWREY LLP

By: _____/s/
Richard A. Ripley (MDBN 465531)

By: _____/s/
Shari Ross Lahlou

(signed by Shari Ross Lahlou with permission of Richard A. Ripley)

Richard A. Ripley

ripleyr@howrey.com

Dimitri J Nionakis

NionakisD@howrey.com

HOWREY LLP

1299 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Telephone: (202) 783-0800

Facsimile: (202) 383-6610

Attorneys for Defendant Millennium Inorganic Chemicals Inc.

VINSON & ELKINS LLP

By: _____/s/_____
James A. Reeder, Jr.

By: _____/s/_____
Shari Ross Lahlou
(signed by Shari Ross Lahlou with permission of James A.
Reeder, Jr.)

James A. Reeder, Jr.
jreeder@velaw.com
VINSON & ELKINS LLP
First City Tower
1001 Fannin Street, Suite 2500
Houston, TX 77002-6760
Telephone: (713) 758-2222
Facsimile: (713) 758-2346

David B. Hamilton (Trial Bar No. 4308)
david.hamilton@wcsr.com
WOMBLE CARLYLE SANDRIDGE & RICE, PLLC
250 W. Pratt Street
Suite 1300
Baltimore, Maryland 21201
Telephone: (410) 545-5850
Facsimile: (410) 694-0871

Attorneys for Defendant Huntsman International LLC

MAYER BROWN LLP

By: _____/s/
Robert E. Bloch

By: _____/s/
Shari Ross Lahlou
(signed by Shari Ross Lahlou with permission of Robert E.
Bloch)

Robert E. Bloch
rbloch@mayerbrown.com
Mitchell D. Raup
mraup@mayerbrown.com
MAYER BROWN LLP
1999 K St NW
Washington, DC 20006
Tel: (202) 263-3203
Fax: (202) 263-5203

Attorneys for Defendant Kronos Worldwide Inc.

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